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October 7, 2020

BY CM/ECF

The Chambers of the Honorable Judge Sanket J. Bulsara
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Elliott v. Donegan, et al., No. 1:18-civ-05680-LDH-SJB

Dear Judge Bulsara:

I write on behalf of Plaintiff and Defendant Moira Donegan to update the Court on our progress in CDA discovery and to respectfully request a slight extension of the discovery schedule.

Since our September 22, 2020 joint letter (ECF 71), the parties have exchanged further correspondence and conferred twice in an effort to reach agreement on the appropriate scope of discovery. Although we have not yet resolved every outstanding issue, we have made significant progress and reached initial agreement on many fronts. In light of the parties' ongoing discussions, Plaintiff intends to serve revised discovery requests on Ms. Donegan later today. The parties will then expeditiously serve responses and objections and, as warranted, produce documents.

To facilitate these productive conversations, the parties respectfully request an extension of the deadline for responses and objections (and for the initial production of documents) from October 8, 2020 to October 21, 2020. The parties further request an extension of the deadline for the close of party discovery on the CDA issue from October 30, 2020 to November 20, 2020.

Respectfully submitted,



Joshua Matz, Esq.
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Counsel for Defendant Moira Donegan